

**To:** Matson, John[matson.john@epa.gov]  
**From:** Schaufelberger, Daniel  
**Sent:** Fri 10/23/2015 4:07:15 PM  
**Subject:** RE: USG

Yes, I'm working today. Also, yes, I've seen that language in the WI SIP – but thought that it referred to emission limitations and not ambient air quality limits (i.e., NAAQS).

Also, regarding your message from yesterday about the time frame of the violations – it is for all five years. Both their allowable and actual emissions were modeled and shown to be over the NAAQS since 2010 (the year the 1-hr ave SO2 NAAQS was adopted).

Daniel Schaufelberger

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**From:** Matson, John  
**Sent:** Friday, October 23, 2015 11:00 AM  
**To:** Schaufelberger, Daniel <schaufelberger.daniel@epa.gov>  
**Subject:** USG

Are you working today?

Also, what about this for Wis-it's in the Wis SIP:

**Regulatory Text:**  
**NR 154.09 Emissions prohibited.**

(1) No person shall cause, suffer, allow or permit emissions into the ambient air in excess of the limits set in these rules, except:

(a) When an approved program or plan with a time schedule for correction has been undertaken and correction is being pursued with diligence.

(b) When emissions in excess of the limits are temporary and due to scheduled maintenance, startup, or shutdown of operations carried out in accord with a plan and schedule approved by the department.

(c) The use of emergency or reserve equipment needed for meeting of high peak loads, testing of the equipment, or other uses approved by the department. Such equipment must be specified in writing as emergency or reserve equipment by the department. Upon startup of this equipment notification must be given to the department which may or may not give approval for continued equipment use.